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Attorneys for Defendant
COINBASE GLOBAL, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ADAM ALFIA, individually and on behalf of other persons similarly situated,

Plaintiffs,

v.

COINBASE GLOBAL, INC., and DOES 1 through 50, inclusive.

Defendants.

Case No. 4:21-cv-08689-HSG

STIPULATION AND ORDER

Ctrm.: 2, 4th Floor
Judge: Haywood S. Gilliam, Jr.

Date Filed: November 8, 2021

Trial Date: Not set

STIPULATION

Pursuant to Civil Local Rules 6-1 and 7-12, Plaintiff Adam Alfia and Defendant Coinbase Global, Inc. (“Coinbase Global”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on November 8, 2021, Plaintiff filed a Complaint against Coinbase Global in this matter, Dkt. 1;

WHEREAS, on November 16, 2021, Plaintiff served a copy of the summons and Complaint on Coinbase Global, such that Coinbase Global's deadline to answer or otherwise respond to the Complaint would otherwise be December 7, 2021;

WHEREAS, the parties have met and conferred, and Coinbase Global has explained that it intends to file both (1) a motion to compel arbitration and (2) if necessary, a motion to dismiss the Complaint;

WHEREAS, to conserve the parties' and the Court's resources, the parties have agreed to phase briefing for the aforementioned motions; and

WHEREAS, the parties have further agreed to a briefing schedule that takes into account the upcoming holidays and counsel's pre-existing commitments;

NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

Coinbase shall have until January 21, 2022 to file a Motion to Compel Arbitration (“MTC”) without waiving its defenses and while preserving its right to file a separate motion under Federal Rule of Civil Procedure (“Rule”) 12 (or otherwise respond to the Complaint) at a later date.

IT IS SO STIPULATED.

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1 Dated: December 2, 2021

KEKER, VAN NEST & PETERS LLP

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3 By: /s/ Erin E. Meyer
4 ERIN E. MEYER

5 Attorneys for Defendant
6 COINBASE GLOBAL, INC.

7 Dated: December 2, 2021

McCATHERN LLP

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9 By: /s/ Evan Selik
10 EVAN SELIK
11 CHRISTINE ZAOUK

12 Attorneys for Plaintiff
13 ADAM ALFIA

14 **ATTESTATION**

15 Pursuant to Local Rule 5-1(i)(3), I attest that each signatory above has concurred in the
16 filing of this document and has authorized the use of his or her electronic signature.

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18 Dated: December 1, 2021

/s/ Erin E. Meyer
19 Erin E. Meyer

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ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

- Coinbase may first file a Motion to Compel Arbitration (“MTC”) without waiving its defenses and while preserving its right to file a separate motion under Federal Rule of Civil Procedure 12 (or otherwise respond to the Complaint) at a later date.
- Coinbase shall have until January 21, 2022 to file its MTC.

IT IS SO ORDERED.

DATED: 12/3/2021

Haywood S. Gilliam, Jr.
HONORABLE HAYWOOD S. GILLIAM, JR.
JUDGE OF THE DISTRICT COURT